

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE LEADER’S INSTITUTE, LLC)	
and DOUG STANEART)	
Plaintiffs and Counter-Defendants,)	
)	
v.)	Case No. 3:14-cv-03572-B
)	
ROBERT JACKSON, and MAGNOVO)	
TRAINING GROUP, LLC)	
Defendants and Counter-Plaintiffs.)	

**DEFENDANTS’ UNOPPOSED MOTION FOR LEAVE TO FILE
LATE ANSWER, DEFENSES, AND COUNTERCLAIMS TO PLAINTIFFS’ THIRD
AMENDED COMPLAINT AND TO AMEND COUNTERCLAIMS**

Defendants Robert Jackson (“Jackson”) and Magnovo Training Group, LLC, (“Magnovo”) (collectively “Defendants”), by their undersigned counsel, file this Unopposed Motion For Leave to File Late Answer, Defenses and Counterclaims to Plaintiffs’ Third Amended Complaint and to Amend Counterclaims, and in support of which state as follows:

1. Plaintiffs’ Third Amended Complaint was filed on December 17, 2015.
2. Counsel for Defendants mistakenly calendared the due date for the filing of the Answer to Plaintiffs’ Third Amended Complaint, and as a result filed Defendants’ Answer, Defenses, and Counterclaims to Plaintiffs’ Third Amended Complaint late on January 11, 2016.
3. Counsel for Defendants was unaware of the requirement to seek leave to amend Defendants’ Counterclaims when responding to Plaintiffs’ Third Amended Complaint, and failed to do so prior to filing Defendants’ Answer, Defenses, and Counterclaims to Plaintiffs’ Third Amended Complaint on January 11, 2016.
4. A true and correct copy of Defendants’ Answer, Defenses, and Counterclaims to Plaintiffs’ Third Amended Complaint, as initially filed on January 11, 2016, is attached as Exhibit A.

5. Plaintiffs, by counsel, have stated that they do not object to this Motion.
6. This motion is filed in the interest of justice and will not delay this matter.

Defendants therefore respectfully request that the Court grant this Motion and enter an order allowing for the late filing of Defendants' Answer, Defenses, and Counterclaims to Plaintiffs' Third Amended Complaint, Leave to Amend Counterclaims, and such other relief it deems appropriate.

Dated: January 15, 2016

Respectfully submitted,

/William K. Doss/

William K. Doss, Indiana No. 20097-29
Steven G. Cracraft, Indiana No. 3417-49
Amy A. Rollins, Indiana No. 31788-49
BRANNON SOWERS & CRACRAFT PC
1 North Pennsylvania Street, Suite 800
Indianapolis, Indiana 46204
Phone: (317) 630.2810
Fax: (317) 630-2813
Email: wdoss@bscattorneys.com
scracraft@bscattorneys.com
arollins@bscattorneys.com

Counsel for Defendants

Glenn E. Janik, TX Bar No. 24036837
Daniel D. Bohmer, TX Bar No. 24040541
JANIK BOHMER PLLC

Gateway Tower
8111 LBJ Freeway, Suite 375
Dallas, Texas 75043
Phone: (214) 390-9999
Fax: (214) 824-5101
Email: glenn@janiklawfirm.com
daniel@janiklawfirm.com
Local Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. Service of this filing will be made on all ECF-registered counsel through the Court's electronic filing system:

Gary Sorden
Darin M. Klemchuk
Roxanne Edwards
Corey Weinstein
KLEMCHUK LLP

Cynthia Cook
BROWN PC

/William K. Doss/

William K. Doss, Indiana No. 20097-29
BRANNON SOWERS & CRACRAFT PC
1 North Pennsylvania Street, Suite 800
Indianapolis, Indiana 46204
Phone: (317) 630.2810
Fax: (317) 630-2813
Email: wdoss@bscattorneys.com